

1 (Whereupon, the deposition
2 began at ^ ^ a.m. ^ p.m.) 9:26.

3 VIDEOGRAPHER: We are now on the record for
4 the deposition of Dr. Christopher Teaf. Today is
5 July 30th, 2008. The time is 9:26 a.m.. would 09:26AM
6 counsel please identify themselves for the Record?

7 MR. PAGE: David Page for the State of
8 Oklahoma.

9 MR. GARREN: Richard Garren State of
10 Oklahoma. 09:26AM

11 MR. ELROD: John Elrod for defendant
12 Simmons.

13 MR. McDANIEL: Scott McDaniel representing
14 Peterson Farms.

15 MR. TUCKER: John Tucker for Cargill. 09:26AM

16 MR. RYAN: Pat Ryan for Tyson and van Cobb
17 or Cobb van test.

18 VIDEOGRAPHER: On the phone?

19 MS. GRIFFIN: Jennifer Griffin for Willow
20 Brook Foods. 09:26AM

21 MR. SANDERS: Bob Sanders for the Cal-Maine
22 defendants.

23 WITNESS

24 having first been duly sworn to testify the truth,
25 the whole truth and nothing but the truth, testified

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1 many of these sources of bacteria and other
2 components come from poultry but they can't
3 identify, at least have not until to point, have not
4 identified any particular field and distance from
5 that field they may have gone. I think that's the
6 question you asked.

01:14PM

7 Q And neither one of those methods /OLGS are
8 being utilized for quantification purposes, are
9 they?

10 MR. PAGE: Object to the form.

01:14PM

11 A Not by me. I can't speak to anybody else. I
12 can't speak for anybody else.

13 Q Is so it would be true that to your knowledge
14 nobody on the State of Oklahoma's team in this case
15 would be able to identify any particular bacteria
16 that might be in the Illinois River or Lake
17 Tenkiller back to a Simmons farm or to a Tyson farm
18 or to a George's farm?

01:14PM

19 MR. PAGE: Object to the form.

20 Q Or a farm that is owned by any of our contract
21 growers?

01:15PM

22 MR. PAGE: Object to the form.

23 A A particular bacterium?

24 Q Yes.

25 A I would say that probably no one has ever done

01:15PM

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1 that.

2 Q No one what?

3 A No one has ever done that to anything. It's
4 not unique to this case.

5 Q You also state in that paragraph No. 19 that 01:15PM
6 the wastewater treatment plants in the IRW are all
7 separate sewage systems, which do not combine
8 untreated waste with storm water runoff. That's
9 true for all POTWs in the IRW?

10 A In the Oklahoma portion there are only three. 01:15PM

11 Q In the Oklahoma portion?

12 A I think that's what it says.

13 Q Well, it says in the IRW.

14 A All three of these locations -- well, all
15 three of these locations are in the Oklahoma portion 01:16PM
16 of the IRW.

17 Q So when you say, quote, the wastewater
18 treatment plants in the IRW are all separate sewage
19 systems, you're simply talking about the ones in the
20 Oklahoma portion of the IRW? 01:16PM

21 A This whole paragraph is speaking only about
22 that. I think it's clear.

23 Q What about on the Arkansas side; are they all
24 SSSs also?

25 A I have not done that analysis. 01:16PM

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